



**U.S. Department of Justice**  
*United States Attorney*  
*Southern District of New York*

86 Chambers Street  
New York, New York 10007

December 15, 2020

**By ECF**

The Honorable Katherine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Debra Early-King v. United States*, 18 Civ. 142 (KHP)

Dear Judge Parker,

This Office represents the United States, the defendant in the above-referenced Federal Tort Claims Act case. We write on behalf of the parties pursuant to the Court's orders directing the parties to provide a status update with respect to settlement negotiations and other pre-trial matters. The parties apologize for failing to file a status update on November 30, 2020, as previously instructed, due to an oversight by both Plaintiff's and Defendant's counsel.

Since the pretrial conference on November 9, 2020, the parties have continued to discuss settlement. Although we have been unable to reach a resolution, the parties will continue to have good-faith discussions to attempt to resolve this matter without need of mediation. In the meanwhile, the parties have discussed internal deadlines for exchanging the necessary information in order to file the Joint Pretrial Order by January 12, 2020, as previously directed by the Court.

Thank you for your consideration of this matter.

Respectfully submitted,

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Acting United States Attorney

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